

## **REMARKS**

Claims 23-31, 33-45 and 47-91 and 93-100 are pending in the application and stand rejected under 35 U.S.C. 103 as being unpatenable over U.S. Patent No. 6,269,336 to Ladd. Applicants submit that at the very least, claims 23, 39 and 80 are patentable and non-obvious over Ladd on the grounds that Ladd does not disclose or suggest a conversational browser or method for processing a CML docuemnt and rendering its conversational dialog in one or more of a plurality of user interface modalities, as essentially claimed in claims 23, 39 and 80.

In the Response to Arguments (page 9) of the Final Action, the Examiner contends that Ladd discloses the claimed conversational browser based on the following. First, Examiner cites Col. 3, lines 40-46 of Ladd as allowing a user to acces information in the form of machine readable data, audio, speech, etc. However, it is *utterly unclear* how this teaches or remotely suggests *parsing and interpreting a CML file or application to render the conversational dialog of such CML file/applocation in one or more of a plurality of user interface modalities*.

Further, the Examiner cites Col. 4, lines 50-58 which states that retrieved information can be output in the form of speech, text graphical information. Again, it is *utterly unclear* how this teaches or remotely suggests *parsing and interpreting a CML file or application to render the conversational dialog of such CML file/applocation in one or more of a plurality of user interface modalities*.

Notwithstanding the above, relying on these cited sections, the Examiner concludes that Ladd teaches “the browser system for processing CML documents having meta information (requested information) to enable interaction with the user ina plurality of user interface modalities as disclosed in the claims.” It is respectfully submitted, however, the such conclusion

is wholly unsupported by the express teachings of Ladd.

In stark contrast, as previously explained by Applicants (and ignored by Examiner), Ladd discloses a *voice browser* (250) that can process a speech markup file to provide an *interactive speech/voice application* (see, e.g., Col 11, line 45 – Col. 14, line 5). Ladd discloses a markup language that enables development of an application for instruction the voice browser to provide a desired user interactive voice service (see, e.g., Col. 15, line 60 – Col. 16, line 4).

However, it does not appear the Ladd discloses or suggests a CML (conversational markup language) that comprises meta-information implementing a conversational dialog to *enable interaction with the user in a plurality of user interface modalities*, much less a browser or method for parsing and interpreting a CML file or CML application to *render the conversational dialog in one or more of the plurality of user interface modalities*. At the very least, the Final Office Action fails to explain with any technical or legal sufficiency how Ladd discloses the claimed CML and CML processing. Without more, the rejections based on Ladd should be withdrawn. Accordingly, claims 23, 39 and 80 (and all claims that depend therefrom) are patentable and non-obvious over Ladd.

Respectfully submitted,



Frank V. DeRosa  
Reg. No. 43,584  
Attorney for Applicant(s)

F. Chau & Associates, LLC  
130 Woodbury Road  
Woodbury, New York 11797  
TEL.: (516) 692-8888  
FAX: (516) 692-8889